



## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 17-4

February 20, 2018

Petition of Comcast Cable Communications, LLC to establish and adjust the basic service tier programming, equipment, and installation rates for the communities in Massachusetts served by Comcast Cable Communications, LLC that are currently subject to rate regulation.

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### DEPARTMENT OF TELECOMMUNICATIONS AND CABLE FIRST SET OF INFORMATION REQUESTS TO COMCAST CABLE COMMUNICATIONS, LLC

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable ("Department") submits to Comcast Cable Communications, LLC ("Comcast") the following information requests:

#### Instructions

1. Each request should be answered in writing on a separate page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. These requests shall be deemed continuing so as to require further supplemental responses if Comcast or its witness(es) receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
3. The term "provide complete and detailed documentation" means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers, including any live Excel, or similar, spreadsheets.

4. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as

Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

5. If any one of these requests is ambiguous, notify the Department immediately so that the request may be clarified prior to the preparation of a written response.
6. File an original and three copies of the responses with the Secretary of the Department, no later than 5:00 P.M. on Monday March 12, 2018.

#### Information Requests

- D.T.C. 1-1 Referring to the Labor Cost and Policy Changes and Schedule B of Comcast's FCC Form 1205:
- a. Identify whether the commissions and the time element associated with the installation of the drop for unwired installations are removed, as required by the Department in C.T.V. 04-3/04-4.
  - b. If the commissions and the time element associated with the installation of the drop for unwired installations are not removed, provide a revised FCC Form 1205 to comply with the Department's Order in C.T.V. 04-3/04-4.
- D.T.C. 1-2 The cover sheet for each FCC Form 1240 and Form 1205 states that the Maximum Permitted Rate ("MPR") is currently noted as the Operator Selected Rate ("OSR"). To update the FCC Forms 1240 and Form 1205 with the correct OSR, please provide a document clearly detailing the most recently approved MPR, Franchise Related Cost ("FRC"), and OSR, as well as the proposed MPR, FRC, and OSR for each rate-regulated Massachusetts franchise.
- D.T.C. 1-3 Referring to Comcast's FCC Form 1205 documentation filed with the Department on September 29, 2017, Comcast indicates that it is switching from using companywide data to regional cost data for the preparation of the company's FCC Form 1205. Please provide a detailed narrative explaining:
- a. The rationale behind the change from a companywide filing to a regional filing.
  - b. What prompted Comcast to change its filing level from companywide to regional?

- c. What geographical level or levels does the regional level encompass in the 2017 FCC Form 1205?
- d. Did Comcast separate operating costs attributable to regional operations from those operating costs attributable to national operations? If yes, please provide and explain the methodology. If this is not the case, please explain why those costs were not separated.

D.T.C. 1-4 Referring to FCC Form 1205, Comcast indicates that while the cost data is prepared with information from the regional level, the installation and maintenance hours are from all regions. Please provide a detailed narrative explaining:

- a. Why did Comcast opt to report the installation and maintenance hours at a different geographical level than cost data?
- b. Why did Comcast assign national information on installation and maintenance hours to regional costs? Provide a detailed methodology.

D.T.C. 1-5 Referring to Comcast's 2017 FCC Form 1205, provide a detailed narrative explaining the increase in the hourly service charge ("HSC") from \$35.21 on the 2016 FCC Form 1205 to \$50.26 on the 2017 FCC Form 1205.

D.T.C. 1-6 Please provide complete and detailed documentation supporting the retransmission consent costs included in both the true-up period and projected period on the FCC Form 1240 for each rate-regulated Massachusetts franchise. As a part of Comcast's response, include a list of each channel electing retransmission consent fees and the amount of each such fee.

D.T.C. 1-7 Please provide a detailed narrative explaining the increases in retransmission costs (FCC Form 1240, Worksheet 7, Line 702) from the 2016 FCC Form 1240 to the 2017 FCC Form 1240 for the respective projected periods. In your response, please identify the cause of the increases in retransmission costs. Additionally, indicate any statewide methodology for calculating retransmission consent costs and any franchise-specific methodologies.

D.T.C. 1-8 Please provide an update to the status of the Attleboro license. The Attleboro FRC sheet shows \$0.00 for the 2017 projected period. Please provide a detailed narrative explaining the reasoning for the Attleboro FRC showing \$0.00. Please provide a detailed narrative including but not limited to the following:

- a. Is Comcast continuing its payments as a holdover from the prior license?
- b. If yes, do those payments only represent capital costs?
- c. Is Comcast continuing to make franchise fee payments?

D.T.C. 1-9

Please provide an update as to the status of the license renewal in each of the following communities. If renewed, please provide the effective date of renewal.

- a. Quincy
- b. Dracut
- c. Rockport
- d. Manchester by the Sea
- e. Merrimack
- f. Southwick

D.T.C. 1-10

Please provide a detailed explanation as to why the Amherst FRC sheet for the projected period does not reflect the newly signed license in Amherst.

D.T.C. 1-11

Please provide a detailed explanation as to the increase in the Deerfield FRC. In the response, please clarify whether the increase in FRC can be attributed to the new license, or if there are other direct or indirect causes for the increase. Also, please provide the signature and effective date of the license, and the date of the \$50,000 payment as well as the source for this payment. Specify the party that made the payment and the party that received the payment.

D.T.C. 1-12

Several communities in Southeastern Massachusetts had WPRI removed from their respective channel lineups. Is this removal of WPRI related to a Designated Market Area (DMA) issue or is there another direct or indirect cause for the removal?